

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

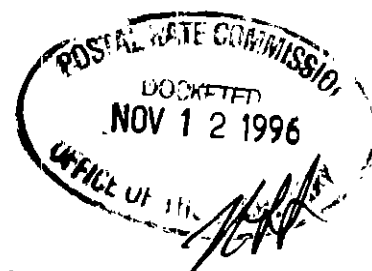
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE OBJECTION TO
INTERROGATORIES USPS/OCA-T300-35, 36c., and 38c. and d.
(November 12, 1996)

The Office of the Consumer Advocate (OCA) hereby objects to interrogatories USPS/OCA-T300-35, 36c., and 38c. and d., submitted October 30, 1996. The interrogatories at issue postulate scenarios so far-fetched and unrealistic that no probative value could be attached to witness Callow's answers to such questions. Interrogatory 35 hypothesizes a "before rates cost coverage of 90 percent in the Docket No. MC96-3 test year" This hypothesis is clearly contrary to the Postal Service's projection of a cost coverage of 100 percent for post office boxes. USPS-T-1, Exh. C. Any speculation by witness Callow on rates he might have proposed if the before-rates cost coverage had been only 90 percent would be pointless. Accordingly, we submit that he need not respond to such a hypothetical question.



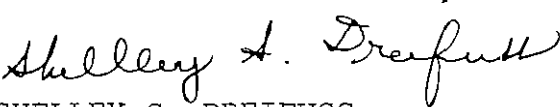
In a similar vein, part c. of interrogatory 36 asks witness Callow to imagine that the Postal Service had used FY 1995 as the test year, instead of FY 1996. This is a direct contradiction of the Postal Service's request in the instant proceeding. If FY 1995 had been the test year, when would the case have been filed? What would the cost coverage have been at that time? An endless list of "what ifs" would have to be formulated in order for witness Callow even to begin answering this question. By the time all of the hypothetical conditions had been posited, it is clear that his answer would necessarily stray so far from the circumstances of the instant proceeding that no matter what he said, the answer would be irrelevant.

Parts c. and d. of interrogatory 38 ask witness Callow to imagine still another set of chimerae, this time concerning what the Commission ought to do in an "interim . . . case" and supposed high levels of CMRA fees. OCA has clearly stated its position, through the testimony of witness Sherman, that adjustments to cost coverages due to factors such as competitors' rates are properly left for an omnibus rate case where all markups are set in relation to one another. OCA opposes the concept of adjusting the cost coverages of selected services

(particularly upward adjustments for those services that are not defended by organized mailing interests) in "interim cases."

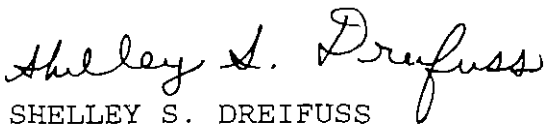
The questions captioned above are not only counter-productive, but waste valuable Commission time. For this reason and the others presented above, OCA objects to the identified interrogatories and asks that witness Callow be excused from answering them.

Respectfully submitted,


SHELLEY S. DREIFUSS
Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.


SHELLEY S. DREIFUSS
Attorney

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